

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

HORIZON GLOBAL AMERICAS, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-00310-PAB
)	
NORTHERN STAMPING, INC.,)	Honorable Judge Pamela A. Barker
)	
Defendant,)	

**DEFENDANT NORTHERN STAMPING, INC.’S MOTION FOR ATTORNEYS’ FEES
PURSUANT TO 35 U.S.C. § 285, 28 U.S.C. § 1927, AND THE INHERENT POWER OF
THIS COURT, AND UNENFORCEABILITY OF THE ASSERTED PATENTS FOR
INEQUITABLE CONDUCT**

Pursuant to the Court’s May 13, 2025 Order (Dkt. 111), Defendant Northern Stamping, Inc. (“NSI”) moves for attorneys’ fees against Plaintiff Horizon Global Americas, Inc. (“Horizon”) pursuant to 35 U.S.C. § 285, against Horizon’s counsel pursuant to 28 U.S.C. § 1927, and against both Horizon and its counsel pursuant to the Court’s inherent power. NSI further moves this Court to find the Asserted Patents unenforceable due to inequitable conduct.

For the reasons provided in more detail in the attached memorandum, NSI respectfully requests that this Court grant this motion.

Dated: May 27, 2025

Respectfully submitted,

By: /s/ Ron N. Sklar

Ron N. Sklar
Dennis J. Abdelnour
HONIGMAN LLP
321 N. Clark St., Ste. 500
Chicago, IL 60654
(312) 701-9300
rsklar@honigman.com
dabdelnour@honigman.com

Jay R. Campbell (0041293)
Carter Ostrowski (0102302)
TUCKER ELLIS LLP
950 Main Avenue Suite 1100
Cleveland, OH 44113
(216) 592-5000
jay.campbell@tuckerellis.com
david.bernstein@tuckerellis.com

Attorneys for Defendant Northern Stamping, Inc.